

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:20-cr-183

vs.

Hon. Robert J. Jonker
Chief United States District Judge

ADAM DEAN FOX,
BARRY GORDON CROFT, JR.,
TY GERARD GARBIN,
KALEB JAMES FRANKS,
DANIEL JOSEPH HARRIS, and
BRANDON MICHAEL-RAY CASERTA,

Defendants.

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BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America, by and through its attorneys, Andrew Byerly Birge, United States Attorney for the Western District of Michigan, and Daniel T. McGraw, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

1. On December 16, 2020, a grand jury in the Western District of Michigan returned an Indictment charging the defendants with kidnapping conspiracy, in violation of 18 U.S.C. § 1201(c). (R.1: Indictment, PageID.573-578.)

2. The Indictment contained a Forfeiture Allegation. The Forfeiture Allegation provided notice to the defendants that upon conviction of 18 U.S.C. § 1201(c), the United States would, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), seek forfeiture of any firearms and ammunition involved in the commission of 18 U.S.C. § 1201(c). (R.1, PageID.578.)

3. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the United States hereby gives notice to the defendants that, upon conviction of violating 18 U.S.C. § 1201(c) as set forth in the Indictment, it will seek to divest through forfeiture proceedings any interest the defendants may now or forever claim to the following property:

| CATS ID 21-FBI-000510 (Defendant Adam Dean Fox) | | | |
|--------------------------------------------------------|------------------------------------------------------------------------------------------------------|---------------------|----------------------------------|
| 1B | Item | Seizure Date | Seizure Location |
| 1B22 | Magazine | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B23 | 17 rounds of 9mm ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B26 | 1 round of .223 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B28 | 5.56 Pmag 30 | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B29 | 27 rounds of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B31 | 6 5.56 caliber magazines | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B32 | 177 rounds of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B36 | Part for a rifle, Picatinny rail | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B43 | 1 green ammo can, labeled 5.56 x 45 containing bag of rifle rounds | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B44 | 4 boxes of 5.56 PMC ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B45 | 8 rifle magazines | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B46 | Box of 100 rounds of Remington 9mm ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B47 | 187 rounds of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B51 | Plastic ammo box containing: 3 boxes of PMC 5.56 ammunition; 21 rounds of 9mm ammunition in a Blazer | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |

| | ammunition box; 37 rounds of 30-30 ammunition in 2 boxes | | |
|--------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------|-----------------------------------|
| 1B55 | 6 rounds of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B55 | 17 rounds of 9mm ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B63 | PSA 16" M4 Carbine 556 Natio 1:7 Nitride 13.5" M-Lok Freedom Upper, with Truglow optics | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B64 | 1 round of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B66 | 1 cartridge case, 30-30 caliber | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B68 | 5.56 rifle magazine | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B69 | 30 cartridges 5.56 caliber | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B70 | 1 9mm magazine | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B71 | 11 rounds of 9mm ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B73 | 1 round of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B76 | 3 rifle magazines and green magazine pouch | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B77 | 58 rounds of 5.56 ammunition | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B21 | Taurus G2C 9mm handgun, S/N TMA82082 | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B67 | Palmetto State Armory PA-15 multi (556/223) caliber Rifle with Holosun Optic and Sling, S/N HP053563 | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B65 | Marlin Rifle Firearms with Mueller Scope 30AS 30/30 Win, S/N 14019745 | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| 1B27 | Smith & Wesson M&P 15 556 Rifle, S/N TE37938 | 10/07/2020 | 3601 S. Division Ave Wyoming, MI |
| CATS ID 21-FBI-000511 (Defendant Adam Dean Fox) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B86 | FN American LLC 509 9mm handgun, S/N GKS0136505 | 10/30/2020 | 2040 Riley Street Hudsonville, MI |

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|------------------------------------------------------------------|---------------------------------------------------------------------------------------------|---------------------|------------------------------------------|
| 1B87 | Panzer Arms AR TWELVE, 12-gauge shotgun, S/N YD-20-09702 | 10/30/2020 | 2040 Riley Street Hudsonville, MI |
| CATS ID 21-FBI-000929 (Defendant Barry Gordon Croft, Jr.) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B63 | Glock 20 GEN 4, 10mm, S/N BMAW940 from a 2010 Kenworth Tractor Truck, VIN 1XKAD49X2AJ262604 | 10/08/2020 | Kenworth Tractor Truck at Swedesboro, NJ |
| CATS ID 21-FBI-000931 (Defendant Barry Gordon Croft, Jr.) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B64 | Magazine loaded with 15 rounds of 10mm ammunition | 10/08/2020 | Kenworth Tractor Truck at Swedesboro, NJ |
| 1B65 | Extended magazine for Glock 20 loaded with 20 rounds of 10mm ammunition | 10/08/2020 | Kenworth Tractor Truck at Swedesboro, NJ |
| 1B76 | Glock 10mm magazine filled with 15 rounds of 10mm ammunition | 10/08/2020 | Kenworth Tractor Truck at Swedesboro, NJ |
| 1B77 | Glock 10mm magazine filled with 15 rounds of 10mm ammunition | 10/08/2020 | Kenworth Tractor Truck at Swedesboro, NJ |
| CATS ID 21-FBI-000962 (Defendant Barry Gordon Croft, Jr.) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B40 | Gray Fasteel 2 3/4-1 1/6 shells | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B41 | 13 12 Gauge shotgun shells 7 1/2-3/4-1 | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B47 | 2 Boxes of 50 Remington UMC revolver and pistol cartridges | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B47 | 1 Box of 50 American Eagle Centerfire Pistol Cartridges | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B47 | 1 Box of 20 speer gold-dot 10mm 200 gr | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B50 | Steeled cased .223 ammunition, loose in ziplock bag | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B53 | 2 Boxes of Winchester Primers | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B54 | 4 Propane Canisters | 10/08/2020 | 511 Daniels Court Bear, DE |

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| 1B58 | 2 .556 x 45 Pmags | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B30 | 25 SGM Tactical 10mm rounds | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B38 | 25 Orange 12-gauge Shotgun Shells 11/8-7 1/2 | 10/08/2020 | 511 Daniels Court Bear, DE |

CATS ID 21-FBI-000966 (Defendant Barry Gordon Croft, Jr.)

| 1B | Item | Seizure Date | Seizure Location |
|------|-------------------------------------------------------------|--------------|----------------------------|
| 1B61 | Standard Manufacturing DP-12 Shotgun, 12-gauge, S/N DP12619 | 10/08/2020 | 511 Daniels Court Bear, DE |

CATS ID 21-FBI-000972 (Defendant Barry Gordon Croft, Jr.)

| 1B | Item | Seizure Date | Seizure Location |
|------|-----------------------------------------------------------------|--------------|----------------------------|
| 1B27 | Explosives | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B27 | Dr Atomics Exploding Targets; Green Hobby Fuse, Plastic Bottles | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B27 | Container Crossman BB's 6000 Count | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B27 | 3 Containers of Double Base Smokeless Propellant | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B27 | 2 Containers of IMR 4831 Smokeless Powder | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B62 | 2 TNT #100 Red Star Explosives with green palm | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B62 | 1 Box of Bounty Hunter High Performance 5" Shells | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B62 | 2 Boxes of 12 Magnum Artillery Shells | 10/08/2020 | 511 Daniels Court Bear, DE |
| 1B62 | 1 Box of 12 electric rain 60 Gram | 10/08/2020 | 511 Daniels Court Bear, DE |

CATS ID 21-FBI-000523 (Defendant Ty Gerard Garbin)

| 1B | Item | Seizure Date | Seizure Location |
|------|-------------------------------------------------------------------------------------------------------------|--------------|-------------------------------|
| 1B26 | Sig Sauer 9mm magazine | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B33 | Ammunition | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B37 | Pietta (F.LLI Pietta, Fabrica D'Armi) Importer: Cabela's LLC Sidney, NE, SA 1873 22LR Revolver, S/N E082509 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |

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| 1B43 | Remington Arms Company, Inc. Seven 243 Rifle, S/N 7700773 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B45 | FNH USA, LLC FNX-45 Tactical, .45 caliber Pistol, S/N FX3U113930 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B46 | Springfield Armory, U.S.A. Military Surplus M1 30 caliber Rifle, S/N 1847727 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B47 | Smith & Wesson SW1911 .45 caliber Pistol, S/N UFA4939 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B48 | Sig Sauer (Sig-Arms) P365 9mm Pistol, S/N 66A372246 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B49 | Taurus Armas Importer: Taurus Miami, Raging Hunter 44 Magnum Revolver, S/N MA511182 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B51 | 80% lower receiver – milled out model JT10 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B54 | Ruger AR-556, .556 caliber Rifle, S/N 856-83585 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B56 | HS Produkt (IM Metal) Springfield Armory (importer) with two magazines, XDS 45 ACP Pistol, S/N S4134024 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B57 | 11 rounds of .45 ammunition from Springfield handgun (1B56) | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B60 | Grand Power S.R.O. with sight Importer: Global Ordnance LLC Sarasota, FL Stribog SP9A1 9mm Pistol, S/N GSA1271 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B61 | Russia Importer: PW Arms Redmond, WA Mosin Nagant M91/30 7.62x54 Rifle, S/N 017813 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B62 | Weatherby (imported by Weatherby Inc.) Vanguard 300 Weatherby Mag Rifle, S/N VS119740 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B63 | Dikar Bergara B14 300 Win Rifle, S/N 61-06-206254-16 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |

| 1B64 | Ruger GP100 .357 Magnum Revolver, S/N 174-79998 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
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| 1B65 | Taurus BZ Importer: Rossi or BrazTech Miami, FL with scope 243 Win Rifle, S/N SP834829 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B66 | Winchester 1200 12-gauge shotgun, S/N L1285744 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B67 | Smith & Wesson Governor, 45/410 caliber Revolver, S/N DJR 5158 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B68 | Henry Repeating Rifle Company, H010AW .45-70 Gov't Rifle, S/N WF09284AW | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B71 | Ruger, unknown model, 17HRM caliber rifle with scope & stand, S/N 83326219 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B72 | CMMG MK 3 308 Rifle, S/N BTS00121 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B74 | Mega Arms LLC with sight, laser and stand, GRT-3S, multi (223/556) caliber Rifle, S/N MBL2614 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B75 | Ruger 10/22 22LR Rifle, S/N 0008-60892 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| B101 | Shotgun barrel | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| CATS ID 21-FBI-000524 (Defendant Ty Gerard Garbin) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B2 | Glock 19Gen4 9mm Pistol, S/N BDGE702 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B3 | Rock Island Armory ARMSCOR Manu.: ACP Philippines 14Y 22LR Rifle, S/N RIA2116581 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B4 | CMMG Inc. MK47 223/556 Rifle, S/N SWT05327 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |

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| 1B5 | Khan Shotguns (Imported by Mossberg International, Inc.) Silver Reserve 410 Shotgun, S/N TR410009911 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B6 | Silver 9mm silencer S/N WAP69 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B7 | Bronze 30 caliber silencer inscribed with "Ty Garbin" S/N TY001 | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B9 | Remington 410 shotgun shells in box SSA | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B15 | Loaded 9mm magazine and 1 CCLA | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |
| 1B17 | 5.56 magazine | 10/07/2020 | 2020 Ford F150 at 1662 Lansing Ave Hartland, MI |

CATS ID 21-FBI-000525 (Defendant Ty Gerard Garbin)

| 1B | Item | Seizure Date | Seizure Location |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------|
| 1B115 | 36 live cartridges Subsonic HP .22 long rifle | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B116 | 9 live cartridges, .410 caliber | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B117 | 401 live cartridges .22 caliber | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B121 | Empty pro magazine, 1 live cartridge 12-gauge, 2 223 live cartridges and 1 LG17 live cartridge with a green tip, 1 live 9mm, 5 .22 caliber | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |

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| 1B122 | Smith & Wesson with loaded mag, M&P 9, 9mm handgun, S/N DXM5938 | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B123 | Thirty-four (34) 9mm live cartridges | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B124 | Two (2) 9mm magazines | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B126 | Kimber with loaded mag, Micro 9, 9mm handgun, S/N PB0074136 | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B127 | One (1) 9mm magazine | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B128 | Seven (7) 9mm live cartridges | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B132 | One (1) 22 live cartridge | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
| 1B134 | 190 live cartridges of Magtech 9mm | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |

| 1B142 | 1 live cartridge | 10/08/2020 | Property located in Ellsworth Twp., Luther, MI, Property ID 080170050 |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------|
| CATS ID 21-FBI-001728 (Defendant Ty Gerard Garbin) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B77 | Smith & Wesson M&P 9 9mm Pistol, S/N NBA3301 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B78 | Remington Arms Company, Inc., 870 Tactical 12-gauge shotgun, S/N CC64813D | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B79 | Remington Arms Company, Inc., 700 300 Rem Ultra Rifle, S/N RR23163G | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B80 | Ardesa (imported by Traditions, Deep River, CT) Buckstalker 50 caliber muzzleloader, S/N 14-13-033435-12 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B70 | Enfield unknown model, 308c Rifle, S/N 93L5014 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B59 | Pioneer Arms Co. Importer: Pioneer Arms Co. Deland, FL PS43-C 7.62x25 Rifle, S/N BC01983P | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B39 | Canik55 (importer by CAI ST ALB VT Century Arms) TP-9 9mm Pistol, S/N 18BC14690 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B55 | Sons of Liberty Gun Works, M4 Multi (223/556) Rifle, S/N 1776-107391 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B38 | Taurus, Raging Bull .454 Revolver, S/N KY351448 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B76 | Akkar Silah Sanayi Tic. LTD (imported by Charles Daly) Triple Threat 12-gauge shotgun, S/N TC6273 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B69 | Henry Repeating Rifle Company, H010BWL Brass Wildlife .45-70 Gov't Rifle, S/N FFSBWL2063 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |

| 1B81 | Henry Repeating Rifle Company H002 US Survival 22LR Rifle, S/N US128261B | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
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| 1B30 | 12 magazines | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B52 | Anderson Manufacturing AM-15 Multi (223/556) Rifle, S/N 18072885 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B58 | Ruger 10/22 22LR Rifle, S/N 0012-49326 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B32 | Loaded magazines | 10/07/2020 | 1662 Lansing Ave., Hartland, MI |
| 1B44 | Century Arms International R1A1 308 caliber Rifle, S/N 108115 or 009041 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B40 | HWM (Weihrauch, Hermann) EAB (importer EAA Corp.) EA/R Windicator .357 Magnum Revolver, S/N 1043388 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B82 | Mossberg International 590 12-gauge Shotgun, S/N V0931946 | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B84 1B86 1B107 | CCLA and SSLA | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B87-88 1B90-93 1B95-99 | CCLA and SSLA ammunition in 11 containers | 10/07/2020 | 1662 Lansing Ave Hartland, MI |
| 1B102 | 12 magazines with CCLA | 10/07/2020 | 1662 Lansing Ave., Hartland, MI |
| 1B109 | 6 long gun magazines with ammunition | 10/07/2020 | 1662 Lansing Ave., Hartland, MI |
| 1B110 | 1 magazine with CCLA | 10/07/2020 | 1662 Lansing Ave., Hartland, MI |
| CATS ID 21-FBI-000537 (Defendant Kaleb James Franks) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B8 | Glock 19 Gen 5 Barrel S/N BKVP830 | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |

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| 1B46 | Ammunition located in Backpack (1B50) | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |
| 1B49 | 2 magazines located in Backpack | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |

CATS ID 21-FBI-000538 (Defendant Kaleb James Franks)

| 1B | Item | Seizure Date | Seizure Location |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------------------------|
| 1B1 | Aero Precision LLC M4E1 Multi 223/556 Rifle, S/N M4-0166805 | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B3 | Polymer80, Inc. PF940C 9mm handgun, S/N none | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B4 | Polymer80, Inc. PF940C 9mm handgun, S/N none | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B6 | Improvised Silencer | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B7 | Ruger Nato 1:7 upper receiver and flash suppressor | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B11 | 6 magazines with ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B14 | Red duffle bag containing: 6 empty magazines; 6 magazines with ammunition; 1 empty Pmag17; Bolt carrier group; 2 flash suppressors; 1 trigger mechanism; 1 Wolf polyformance; 9mm luger box with ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B15 | Improvised Silencer from red duffle bag | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B16 | Aero Precision LLC M4E1, multi (223/556) caliber Rifle, S/N M4-0078295 | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B17 | Phantom Trijicon MRO magnifier S/N 145219; Holosun laser site, model: LS 321G, S/N 0800201293; Protac Railmount 2 streamlight, S/N 055661 107 (attached to 1B16) | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B18 | Silencer labeled with Kaleb Franks Waterford, MI 223 S/N 007 on 16A | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |

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| 1B19 | Pmag 30 magazine with green tip ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B20 | Sig Sauer, Inc. P238 .380 Auto Pistol, S/N 27B166562 | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B21 | Magazine with ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B24 | 2 magazines, one loaded one empty | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B25 | Ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B26 | 4 magazines with green tip ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B28 | 1 Pmag 17 with ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B32 | Loose ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B33 | 5 boxes of ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B34 | Ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B36 | Magazine with ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B37 | Ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B38 | Springfield Armory (importer) 1911-A1 .45 caliber handgun, S/N NM422506 | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B39 | Gun case with 4 magazines and holster kit | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |
| 1B43 | Luger ammunition | 10/07/2020 | 1034 Holbrook Ave Waterford, MI |

CATS ID 21-FBI-000544 (Defendant Daniel Joseph Harris)

| 1B | Item | Seizure Date | Seizure Location |
|-----------|------------------------------------------------------------------------------------|---------------------|-------------------------------------------|
| 1B18 | FNH USA, LLC (with magazine and scope, S/N 507337), 509 9mm Pistol, S/N GKS0087747 | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |
| 1B19 | 17 9mm rounds of ammunition | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |
| 1B120 | Tan colored rifle butt-stock belonging to Dan Harris | 10/07/2020 | 1140 James L. Hart Parkway, Ypsilanti, MI |

| CATS ID 21-FBI-000545 (Defendant Daniel Joseph Harris) | | | |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------------------|
| 1B | Item | Seizure Date | Seizure Location |
| 1B66 | Connecticut Valley Arms Plainsman 50 caliber Rifle, S/N 837212 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B72 | Century Arms International (with Sig Sauer Romeo S optic) RAS47 7.62x39 Rifle, S/N RAS47045225 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B74 | Anderson Manufacturing (with flashlight attached and spitfire 3X scope, S/N 200300499), AM- 15 223/556 Rifle, S/N 16012390 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B75 | Russian Imported by CAI Georgia, VT, Mosin Nagant 7.62 Rifle, S/N M3814194 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B69 | Sturm, Ruger & Co. 10/22 22LR Rifle, S/N 0002-39443 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B58 | Harrington & Richardson 22 Special, .22 caliber Revolver, S/N 586079 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B60 | Replica Arms Inc. (importer) PN XX7 36 caliber Revolver, S/N N9067 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B62 | TISAS – Trabzon Gun Industry Corp. (imported by Umarex USA, Inc.) Regent R100 .45 caliber Pistol, S/N 13Y03300 | 10/07/2020 | 1262 Beach Drive Lake Orion, MI |
| 1B111 | 4 rounds of 7.62 x 39 CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B106 | Shotgun barrel | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B106 | 2 flash suppressors | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B105 | 27 boxes of 223 CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B100 | Ammunition in blue holder | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B105 | 1 loose CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |

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| 1B23 | Ammunition; 223 CCLA, 9mm, 16mm, 16CC, 22 CCLA, 14 CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B67 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B73 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B76 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B80 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B92 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B94 | Ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B86 | 2 .22 caliber magazines (one loaded) | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B73 | Magazine | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B64 | Green ammunition box with CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B63 | Green ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B61 | Box with magazine and ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B56 | Box of 22 long rifle rounds | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B48 | Bag of CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B44 | Gun case with magazine and ammunition | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B26 | 9mm CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B22 | Box of Hornady critical defense 9mm luger 115gr FTX with 225 CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B21 | Box of 5 cartridges 12-gauge shotgun shells with 5 CCLA | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |
| 1B20 | Box of Aguila lead slug 12 gauge | 10/07/2020 | 1262 Beach Drive, Lake Orion, MI |

| CATS ID 21-FBI-000546 (Defendant Daniel Joseph Harris) | | | |
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| 1B | Item | Seizure Date | Seizure Location |
| 1B8 | 9mm CCLA | 10/07/2020 | Mazda MX3 located at 1662 Lansing Avenue, Hartland MI |
| 1B11 | 8 loaded magazines; 1 empty magazine | 10/07/2020 | Mazda MX3 located at 1662 Lansing Avenue, Hartland MI |
| CATS ID 21-FBI-000664 (Defendant Brandon Michael-Ray Caserta) | | | |
| 1B | Item | Seizure Date | Seizure Location |
| 1B18 | Glock with light 17 Gen 5 9mm handgun, S/N BHMW228 | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B19 | BG Defense LLC Type A Multi (223/556) handgun, S/N M4-01008 | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B20 | Bushmaster Firearms with Holosun light XM15-E25 223 caliber Machine Gun, S/N BFH036266 | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B52 | Box of gun repair parts | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B50 | Box of CCLA ammunition | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B51 | Box of CCLA ammunition | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B45 | Ammo can of CCLA | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B46 | Ammo can of CCLA | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B48 | Ammo can with CCLA | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B47 | Ammo can with CCLA and 2 magazines | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |

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| 1B44 | Tray containing 4 ammo cans of CCLA | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B43 | 8 magazines | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B43 | 240 rounds of ammunition | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B39 | Magazines | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B35 | Shoe box of gun accessories | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B33 | 60 rounds of .223 ammunition | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B32 | 18 rounds of 9mm ammunition | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B27 | Twelve (12) 5.56 caliber magazines | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B27 | Two (2) 9mm caliber magazines | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |
| 1B26 | Gun accessories | 10/07/2020 | 41058 Heathmore Ct Apt 15, Canton, MI |

CATS ID 21-FBI-000665 (Defendant Brandon Michael-Ray Caserta)

| 1B | Item | Seizure Date | Seizure Location |
|-----|---------------------------------------------------|--------------|----------------------------------------------------------|
| 1B1 | Glock 29, 10mm handgun with magazine, S/N BMTS901 | 10/07/2020 | 1999 Chrysler LHS at 40485 Schoolcraft Road Plymouth, MI |
| 1B2 | 10mm ammunition | 10/07/2020 | 1999 Chrysler LHS at 40485 Schoolcraft Road Plymouth, MI |

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|-----|------------------------|------------|----------------------------------------------------------|
| 1B3 | Magazine | 10/07/2020 | 1999 Chrysler LHS at 40485 Schoolcraft Road Plymouth, MI |
| 1B3 | 15 Hornady 10mm rounds | 10/07/2020 | 1999 Chrysler LHS at 40485 Schoolcraft Road Plymouth, MI |

4. By giving notice of its intent to forfeit the property specified above, the United States in no way limits its ability to seek the forfeiture of later-identified assets pursuant to the notice provided herein and in the Forfeiture Allegation of the Indictment.

Respectfully submitted,

ANDREW BYERLY BIRGE
United States Attorney

Dated: March 30, 2021

/s/Daniel T. McGraw
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